COMMONWEALTH OF MASSACHUSETTS

Western Massachusetts)	DTE 04-106
Electric Company)	

First Set of Information Requests of Western Massachusetts Industrial Customers Group

Instructions

The following instructions apply to this set of Information Requests and all subsequent

Information Requests issued by Western Massachusetts Industrial Customers Group

("WMICG") to Western Massachusetts Electric Company ("WMECo" or "the Company"), in
this proceeding.

- 1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
- 2. Do not wait for all answers to be completed before supplying answers. Provide answers as they are completed.
- 3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness(es) receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 4. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phone-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data complications from which

information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

- 5. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
- 6. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department of Telecommunications and Energy ("DTE"), and a copy on the Hearing Officer for the DTE, as well as serving the appropriate number of copies to all parties and participants on the service list in this proceeding.
- 7. Please provide responses to all questions within 5 days. If this is not possible for any of the questions, please indicate which questions will take longer than 5 days within the earlier responses.

Information and Document Requests

- 1. Please indicate the period used to determine Current Rate Revenue in Exhibit A, Attachment 3.
- 2. If Current Rate Revenue in Exhibit A, Attachment 3 is not calendar year 2003, please provide actual current revenue for 2003.
- 3. Please provide the actual billed sales for 2003 by rate class. Please revise Exhibit A, Attachment 3 using revenues and billed sales for 2003.
- 4. Please provide pro forma revenue adjustment for special contracts as if the contract customers were billed on the applicable rate without discounts or adjustments under their special contract.
- 5. Please provide a copy of WMECo' FERC Form Annual Report for calendar year 2002 and 2003.

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- 6. Please provide Annual Financial Reports for calendar year 2002 and 2003 of WMECO and Northeast Utilities and all quarterly reports subsequent to December 31, 3003.
- 7. Please provide a copy of the last allocated cost of service study which was the subject of an adjudicatory proceeding before the Department to design rates and/or allocate revenue requirements.
- 8. Please provide an allocated cost of service study for distribution service under current and proposed distribution revenues and expenses. All expenses should be allocated by an allocator derived in accordance with how the applicable expense is incurred.
- 9. Please provide an allocated cost of service study under current and proposed transmission revenues and expenses to be collected under the Company's transmission rates and transmission adjustment clause. All expenses should be allocated in accordance with how the applicable expense is incurred.
- 10. Please indicate if Rate PR will be adjusted after March 1, 2005 to reflect any increase or decrease in the applicable Default Service Charge. If so, please explain how the adjustment will be determined and where in tariff the adjustment is described.
- 11. Please indicate if customers currently on Rate PR will be able to purchase competitive generation supply. If so, will they receive a credit (shopping credit) equal to the current standard offer service charge of 5.607¢ per kWh embedded in Rate PR. Please indicate if Rate PR as filed contains any provision for such credit in the tariff. If not, provide appropriate language.
- 12. Under the earnings sharing provision in Article V of the Settlement Agreement, please indicate if there will be any pro forma adjustment in revenues to remove the impact of any discount rate or special contract. If so, what? If not, why not?

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- 13. Please verify the threshold level of .001253 times operating revenues in the Blackstone Company settlement approved in DTE 04-79.
- 14. Please confirm that the Low-Income Program expansion proposed in Article VIII of the Settlement Agreement will not reduce the Company's return on common equity for earnings sharing purposes absent such expansion.
- 15. Please recalculate Exhibit A, Attachments 5, 6 and 7 using the applicable default service charge for March 2005 for each rate. For rates which currently have a demand and energy standard offer charge convert the demand charge to an energy charge using the average hours use of the demand for the applicable rate.
- 16. Please provide the number of customers included under the Rate "Contracts" in Exhibit A, Attachments 3 and 8. As of January 1, 2005 how many customers are still served under contracts.
- 17. Please reconcile and explain in detail all differences in the Pro Forma Income Statement, Schedule C-1.0 Operating Revenues with Current Rate Revenues in Exhibit A, Attachment 3, p. 1.
- 18. Please reconcile and explain in detail all differences in Current Transmission

 Revenue on Exhibit A, Attachment 3, p.2 with Transmission Revenues on Exhibit A, Attachment

 9.
- 19. Please provide the level of transition cost over-recovery as of December 31, 2002; December 31, 2003 and the estimated amount as of December 31, 2004 including all carrying charges ordered by the Department in DTE 03-34.
- 20. Please indicate how much of these over-collections will be reduced in calendar year 2005 by the proposed reduction in the transition charge from 8.28 to 5.0 mills.

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